

BEFORE THE  
**Federal Communications Commission**  
WASHINGTON, D.C. 20554

In the Matter of

**Planet Labs Inc.**

Authorization to Launch and Operate a  
Remote-Sensing Satellite System

To: Chief, International Bureau

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File No. SAT-LOA-20130626-00087  
Call Sign: S2912

**REQUEST OF PLANET LABS INC. FOR DETERMINATION OF  
COMPLIANCE WITH SATELLITE IMPLEMENTATION MILESTONES**

Planet Labs Inc. (“Planet Labs”), pursuant to Section 25.164 of the Commission’s Rules, hereby notifies the Commission that it has met the first three milestones set forth in the authorization released on December 03, 2013.<sup>1</sup> In the *Planet Labs Grant*, the Commission granted Planet Labs authority to construct, launch, and operate a non-geostationary-orbit (“NGSO”) satellite system consisting of twenty eight (28) Earth Exploration Satellite Service (“EESS”) spacecraft – collectively known as Flock 1 – that will operate in the 8025-8400 MHz frequency bands and receive command signals in the 2025-2110 MHz band. Planet Labs is also authorized to use the 401-402 MHz and 449.75-450.25 MHz bands for early-phase and emergency-backup telemetry, tracking, and command operation.

In this Request, Planet Labs demonstrates that it: (i) has entered into binding, non-contingent arrangements for the construction of all twenty eight (28) satellites authorized in the *Planet Labs Grant*; (ii) has completed Critical Design Review of all twenty eight (28) satellites; and (iii) has commenced physical construction of the first satellite. As a result of these showings, Planet Labs respectfully requests that the International Bureau determine that Planet

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<sup>1</sup> *Planet Labs Inc.*, Stamp Grant in File No. SAT-LOA-20130626-00087 (released December 03, 2013, “*Planet Labs Grant*”).

Labs has satisfied the first three milestone requirements that were imposed in the *Planet Labs Grant*.

The determination that Planet Labs has satisfied the first three satellite system implementation milestones will allow Planet Labs to reduce the amount of the \$5 million bond required within the 30 days of the date of the authorization to \$2 million. *See* 47 C.F.R. § 25.165(d). Planet Labs seeks the prompt issuance by the Commission of a public notice authorizing this bond reduction.

### **Summary**

The Bureau granted Planet Labs' NGSO EESS system application on December 03, 2013 in the *Planet Labs Grant*. Paragraph 6 of the Attachment to Grant required Planet Labs to meet five satellite implementation milestones, as follows:

- Enter into a binding non-contingent contract to construct the licensed satellite system by December 3, 2013;
- Complete Critical Design Review by December 3, 2015;
- Begin construction of the first satellite by June 3, 2016;
- Launch and begin operation of the first satellite by June 5, 2017;
- Bring all of the authorized satellites into operation by December 3, 2019.

*See Planet Labs Grant*, Attachment to Grant at 1-2. In addition, Paragraph 7 of the Attachment to Grant also mandated that Planet Labs file a \$5 million bond with the Commission within 30 days of the grant date, *i.e.* by January 2, 2014, pursuant to procedures established by the Commission.

Under the Commission's Rules, an NGSO licensee may reduce the amount of its bond by \$1 million upon successfully meeting a milestone deadline set forth in Section 25.164 of the Rules. *See* 47 C.F.R. §25.165(d). The Commission's procedures provide that licensees will be permitted to file a new bond at a lower amount only after the International Bureau announces that the licensee has met the milestone(s). *See* FCC Public Notice, Report No. SPB-187, DA 03-

2602, 18 FCC Rcd 16283 (2003).

Planet Labs' progress toward implementing its authority for its twenty eight (28)-satellite NGSO EESS system has already reached the first three milestone points contained in the *Planet Labs Grant*. In fact, Planet Labs has constructed all twenty eight (28) satellites in-house, delivered all twenty eight (28) satellites to the launch integrator on November 7, 2013<sup>2</sup>, and all twenty eight (28) satellites have been integrated onto the Antares launch vehicle, currently scheduled for launch on January 13, 2014.

Accordingly, Planet Labs is filing this notification pursuant to Sections 25.164(c), (d) and (e) of the Commission's Rules to report its completion of these three requirements. In addition, because satisfaction of these requirements permits it to reduce the amount of the bond filed with the Commission, it is requesting that the Commission review this submission and issue a determination that Planet Labs has met its first three implementation milestones, allowing it to reduce the amount of its performance bond to \$2 million, commensurate with the progress made to date in bringing its authorized system into service. Appropriate showings regarding the completion of the three milestones are shown in the attachments.

#### **Request for Determination of Milestone Compliance**

Planet Labs has submitted the foregoing information in compliance with Sections 25.164(c), (d) & (e) of the Commission's Rules governing milestone compliance. This information demonstrates that the first three implementation milestones set forth in the *Planet Labs Grant* have already been met. The Commission's Rules provide that NGSO licensees "will be permitted to reduce the amount of the bond by \$1 million upon successfully meeting a milestone deadline set forth in section 25.164(b) of this chapter." 47 C.F.R. § 25.165(d). Inasmuch as Planet Labs has

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<sup>2</sup> Werner, Debra. "Planet Labs Launches Two More Satellites - Delivers Largest Imaging Fleet to Launch Pad." *SpaceNews* November 26, 2013. <http://spaceref.biz/2013/11/planet-labs-launches-two-more-satellites---delivers-largest-imaging-fleet-to-launch-pad.html>

demonstrated herein that it has completed the initial three implementation milestones to which it is subject, it respectfully requests that the Commission affirm this fact, allowing it to reduce the amount of its bond to \$2 million.

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Should there be any questions regarding the foregoing information, please contact the undersigned representative.

Respectfully submitted,  
**PLANET LABS INC.**

By: s/ Michael Safyan  
Michael Safyan  
Regulatory Compliance  
Planet Labs Inc.

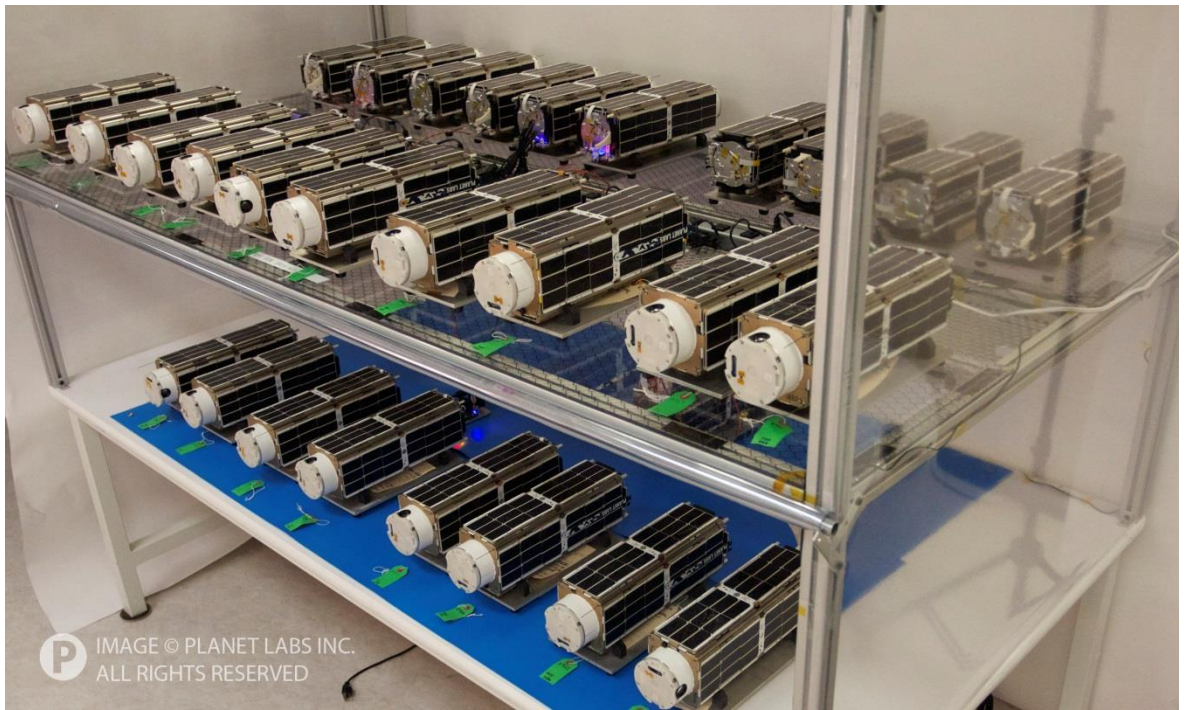
December 20, 2013

### **List of Attachments**

Attachment A      Picture of all twenty eight (28) Flock 1 satellites constructed and ready for delivery to the launch site (11/6/2013)

Attachment B      NanoRacks Customer Payload Acceptance Receipt (11/7/2013)

## **Exhibit A**



**Figure 1 All twenty eight (28) Flock 1 satellites constructed and ready for delivery to the launch site (11/06/2013).**

**Exhibit B**

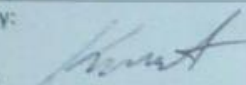


Customer Payload  
Acceptance Receipt

# NANORACKS

Contract	Ship Via	FOB	Project
SLDC#1	SWA Cargo	Houston, TX	Flock1

Quantity	Part No.
28	See Enclosure (1), List of all Flock1 Dove satellites by serial # with associated NanoRacks deployer.

Received by:	Kirk Woellert External Payloads Manager	Date:
NanoRacks		11/6/2013
Thank you for your trust in our products and services.		



NANORACKS

RECEIVED HOUSTON TX

Nov 7, 2013